

VEDDER PRICE P.C.
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**UNITED STATES BANKRUPTCY COURT
THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that Agri-Fab, Inc. (“Agri-Fab”), by and through its counsel, served a written Demand for Reclamation of Goods pursuant to 11 U.S.C. § 546(c), section 2-702 of the Uniform Commercial Code and other applicable non-bankruptcy law, on the above-captioned Debtors and their counsel, on October 26, 2018. A copy of Agri-Fab’s Demand for Reclamation of Goods (with the exhibit thereto) is attached hereto as **Exhibit A** and incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that, as set forth in the Demand for Reclamation of Goods, Agri-Fab expressly reserves every right, power, remedy, claim and defense now or hereinafter existing at law, in equity or by statute, and the exercise of any such right, power, remedy, claim or defense shall not be construed as a waiver of the right to exercise, at the same time or thereafter, such right, power, remedy, claim or defense. Additionally, Agri-Fab expressly asserts and reserves its rights to file and pursue an administrative expense claim for the value of

all goods received by the Debtors within twenty (20) days before the commencement of the Chapter 11 Cases in accordance with 11 U.S.C. § 503(b)(9).

Dated: October 31, 2018

Respectfully submitted,

VEDDER PRICE P.C.

By: /s/ Kevin J. Etzel

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